

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALESIA MILANESI et al.,

: 07 Civ. 7248 (TPG)

: Plaintiffs,

:
: **DEFENDANT'S FIRST**
: **REQUEST FOR THE**
: **PRODUCTION OF**
: **DOCUMENTS**

:
-against-

THE REPUBLIC OF ARGENTINA,

: Defendant.
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Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, defendant the Republic of Argentina (the "Republic") requests that plaintiffs produce for inspection and copying any and all copies of the documents requested herein on or before November 14, 2007 at the offices of Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, New York 10006 (Attn.: Jonathan I. Blackman).

DEFINITIONS

1. Unless otherwise indicated, the Republic adopts and incorporates herein the uniform definitions for discovery requests set forth in subparagraphs (c) and (d) of Rule 26.3 of the Local Civil Rules of the United States District Court for the Southern District of New York and the terms used herein are to be construed accordingly.

2. "Document(s)" means and includes all writings in any form, notes, memoranda, manuals, reports, records, correspondence, drawings, graphs, charts, photographs, telephone records, data compilations of whatever nature (including those from which information can be obtained or translated if necessary), tape recordings, electronic mail messages, and electronic data (including any exchange of information between computers and all information stored in an electronic form or computer database).

3. The "Complaint" means the Complaint in this action, dated August 14, 2007.

4. "Plaintiff," "You" and "Your" mean each and every person and organization identified as a plaintiff in the Complaint, and includes any brokers, trustees, beneficiaries, advisors (including but not limited to investment or financial advisors), agents, and employees of Plaintiff.

5. The "Republic" means defendant the Republic of Argentina and the officials, employees, and agents representing the Republic, including but not limited to the Republic's public officials, investment bankers, agents (including fiscal agents and trustees), registrar, and legal counsel.

6. The "Republic Bond" or "Republic Bonds" means any bond issued by the Republic, including any Republic Bond alleged in the Complaint to be held by Plaintiff.

INSTRUCTIONS

1. These Document Requests are continuing in nature. In accordance with Rule 26(e) of the Federal Rules of Civil Procedure, You are required to file supplementary answers and produce additional Documents if You obtain further or different information and the Republic specifically reserves the right to seek supplementary answers and the additional supplementary production of Documents before trial.

2. Unless otherwise indicated, the time period covered by these Document Requests is the earliest date on which Plaintiff purchased a Republic Bond to the present.

3. Where a claim of privilege is asserted in objecting to any Document Request, identify the nature of the privilege (including work product) that is being claimed and

the privilege rule being invoked, and for each Document withheld provide the following information:

- (a) the type of Document;
- (b) the date of the Document;
- (c) the author(s), addressee(s), and recipient(s) of the Document, and, where not apparent, the relationship of the author(s), addressee(s), and recipient(s) to one another;
- (d) the number of pages;
- (e) the identity of any enclosure(s) or attachment(s); and
- (f) the subject matter of the Document.

4. The Documents responsive to these Requests are to be produced as they

were kept in the ordinary course of business and are to be labeled in such a way as to show which files they came from.

DOCUMENT REQUESTS

1. All confirmations and account statements concerning Your purchase or acquisition of Republic Bonds. If You acquired Republic Bonds at any time prior to December 2001, all confirmations and account statements establishing proof of beneficial ownership as of December 2001.
2. All Documents, other than those produced in response to Document Request No. 1, establishing Your continued ownership of Republic Bonds.

3. All Documents concerning Your purpose in acquiring Your Republic Bonds.

Dated: New York, New York
October 15, 2007

CLEARAY GOTTLIEB STEEN & HAMILTON LLP

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